

Teri B. Himebaugh, Esq.  
220 Stallion Lane  
Schwenksville, PA 19473  
PA ID 53603

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COREY WHITE	:
Plaintiff	:
	:
v.	: Civil Action No. 02-CV-04066
	:
CITY OF PHILADELPHIA, et. al.	:
	:
Defendants	:

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

1. Do any of you know the attorneys in this case?

Teri B. Himebaugh  
Peter Han  
Robin Arnold

2. Do any of you know the Plaintiff, Corey White?

3. Do any of you know either of his witnesses:

Jason Milner  
Tunasia Johnson

4. Do any of you know any members of the Philadelphia Police Department, including, but not limited to:

PO Michael Iannacone  
PO Eric Blocker  
PO Alfonse Johnson  
PO Claudia McDonald  
PO Jose Roman  
PO Gregory Davis  
PO Brenda Harrison

5. Have any of you or members of your immediate family been employed by a police department, law enforcement agency or any other governmental agency?
6. Have any of you or members of your immediate family been employed by the City of Philadelphia? If so, in what capacity and for how long?
7. Are any of you more inclined to believe the testimony of a police officer or member of a law enforcement agency because of the position that they hold?
8. Are any of you more inclined to find that the force used by a police officer was lawful simply because it was done during the course of an otherwise legitimate police arrest?
9. Do any of you have any feelings, in general, or any specific problems towards persons claiming money damages for personal injuries or deprivations of their constitutional rights?
10. Do any of you have any feelings, in general, or any specific problems awarding damages to a person for use of excessive force when that person was lawfully arrested during the same incident?
11. Does anyone have any ill feelings towards individuals that sue police officer or members of a law enforcement agency since the tragic events of 9-11-01?
12. Have any of the prospective jurors had any prior jury service? If so, please describe.
13. Have any of the prospective jurors been parties to a lawsuit, either as a plaintiff or defendant? If so, please explain.
14. Do any of you have any medical problems that would prevent you from serving on the jury?
  - a. Do any of the prospective jurors have a hearing problem?
  - b. Do any of the prospective jurors have any other disability, physical or otherwise?
15. Does anyone feel that police can use whatever force is necessary to arrest or place an individual into custody?
16. Would your opinion change if the individual was resisting arrest or under the influence of alcohol or drugs?

Respectfully Submitted,

**By:** \_\_\_\_\_  
TERI B. HIMEBAUGH, ESQUIRE  
ATTORNEY FOR PLAINTIFF